

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2024/126040/01-L01
Your ref: APP/24/00405
Date: 06 September 2024

Dear Planning

HYBRID APPLICATION SEEKING: 1) FULL PERMISSION FOR DEVELOPMENT OF NEW PIPELINES TO TRANSFER WATER FROM BEDHAMPTON SPRINGS TO FILL THE RESERVOIR IN THE WINTER AND DRAW IT OFF TO TREAT AND SUPPLY WHEN NEEDED IN THE SUMMER, COMPRISING: CONSTRUCTION OF TWO PREDOMINANTLY UNDERGROUND PIPES IN TUNNELS LINKING THE RESERVOIR WITH THE EXISTING PUMPING STATION AT BEDHAMPTON WITH ASSOCIATED INFRASTRUCTURE INCLUDING: EMERGENCY DRAWDOWN DISCHARGE STRUCTURE AT HERMITAGE STREAM; CONSTRUCTION OF EIGHT ACCESS SHAFTS; UPGRADES TO EXISTING CULVERTS CLOSE TO SHAFTS FIVE, SIX AND EIGHT TO MANAGE FLOOD RISK; WASHOUT AND AIR VALVE CHAMBERS (TYPICALLY BELOW GROUND), NEW PLANT AT BEDHAMPTON PUMPING STATION, MODIFICATIONS TO BEDHAMPTON 2 OPERATIONAL BUILDING AND PERMANENT DIVERSION OF FOOTPATH 34 AT BEDHAMPTON PUMPING STATION.

2) OUTLINE APPLICATION FOR AN ASSOCIATED UNDERGROUND CROSS-CONNECTION CHAMBER AND ABOVE GROUND KIOSK AT THE RESERVOIR SITE WITH VEHICULAR ACCESSSES FOR MAINTENANCE.

AN ENVIRONMENTAL STATEMENT HAS BEEN SUBMITTED WITH THE APPLICATION UNDER THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017.

HAVANT THICKET, ADJACENT TO SIR GEORGE STAUNTON COUNTRY PARK, MIDDLE PARK WAY, HAVANT

Thank you for consulting the Environment Agency on the above planning application.

Environment Agency Position

Having assessed the information submitted with this application the Environment Agency **objects** to this application at this time for the following reason.

Insufficient information has been submitted to determine the risks posed to fisheries/physical habitats from the culverting of the Riders Lane stream, specifically the culvert upgrades at Purbrook Way, Dunsbury Way and Middle Park Way.

Reason

This objection is supported by paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity.

If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

A flood risk activity permit will be required from the Environment Agency for these works and at this time this is unlikely to be forthcoming.

Overcoming our Objection

On review of the information submitted, namely drawings HTR-WAB-PI-W8-DR-T-0003, HTR-WAB-PI-W6-DR-T-0003, HTR-WAB-PI-W8-DR-T-0003 its unclear how the new pipes interact with the existing up and down stream bed level. We have provided guidance on the culvert upgrades to the project team. We have advised that the culverts should be designed to allow fish passage and ensure longitudinal connectivity within the watercourse. Based on our interpretation of the drawings, the pipes appear to be set above bed level of the watercourse. This is likely to create a blunging effect and/or lip which will create a potential barrier to fish movement (now or in the future). The design also has the potential to restrict natural processes, namely sediment transport. The drawings refer to existing below ground detail but state this detail is unknown. **The new pipe(s) should be set below existing bed level. This either needs to be clearly shown on the drawings or the designs revised.**

Environmental Statement Volume 4 – Appendices Revised Appendix A9 Biodiversity A9.3 Aquatic Ecology makes no reference to fish passage at the culverts. It's unclear if the depth and velocity through the upgraded culverts have been assessed in the context of fish passage. **The applicant should provide evidence to show that their culvert upgrades will facilitate fish passage.**

If you are minded to grant permission against our advice, please contact us before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal on this and other environmental issues.

Advice to LPA/Applicant

BNG

Environmental Statement Volume 4 – Appendices Appendix 9 Biodiversity Appendix 9.21 Biodiversity Net Gain (BNG) Assessment

Doc No.: HTR-ATK-XX-XX-RP-Z-0090

We have not scrutinised the calculations that underpin the net loss figures in 7.11. (p.45). However, we agree with the overall conclusion and the need to be mindful of Portsmouth Water's existing commitments to Regulation 19/Article (4)7 of the Water Framework Directive. We support the principle of prioritising BNG opportunities within the Hermitage Catchment. Noting that a significant length of the corridor falls within

existing commitments. We would suggest the six-weir system (SU7064806277), identified in the document and adjacent to Portsmouth Waters Bedhampton Springs site would be an area to investigate/prioritise. We note that full details on how BNG will be met will come pre commencement.

Noise/Vibration

Neither Environmental Statement Volume 4 – Appendices Appendix 9 Biodiversity Appendix A9.16: Pipeline Ecological Update. Atkins Doc No.: HTR-ATK-XX-XX-RP-Z-0088 or Environmental Statement Volume 4 – Appendices Revised Appendix A9 Biodiversity A9.3 make any assessment of the impact of noise/vibration on the aquatic environment.

If you require any clarification regarding the above please do not hesitate to contact me using the details below.

Yours faithfully

Mrs Laura Lax
Senior Planning Advisor

Direct dial 0208 4745902

Direct e-mail laura.lax@environment-agency.gov.uk